

1. **EPA Requirement:** Collect discrete soil samples from 0-6" and 1-2'.  
**PRP Proposal:** Composite shallow & deeper samples for all analysis except VOCs.

**Discussion:** Samples should not be composited.

1. Compositing may dilute any contamination & risk.
2. PRP claims considerable reworking & mixing of soils, yet area & depth of any such reworking unknown. Also, date of any reworking & date of any spills unknown - did reworking occur before any spills? - if so, any reworking would not be a factor in mixing areas of contamination.

2. **EPA Requirement:** Shallow soil samples (top 1") from vacant lot southwest of Site should be analyzed for SVOCs, pesticides, PCBs, & metals.  
**PRP Proposal:** Samples from vacant lot should be analyzed only for COCs in on-site samples that exceed residential based soil screens.

**Discussion:** Soil samples should be analyzed for all SVOCs, pesticides, PCBs, & metals.

- Purpose for shallow samples is to investigate air deposition from sand blasting operations & follow any contamination from the Site to the community.
- Dust from Site operations blew towards Bridge Harbor community over this vacant lot.
- Community is concerned about health effects from Site air releases.
- Site installed fabric fence on southwest side of Site to catch this dust.
- On-site contamination may result from surface water runoff and spills in addition to air deposition.
- On-site samples will be collected from 0-6", which may dilute any surface contamination resulting from air deposition.
- Any 0-6" sample results less than the screens doesn't mean that the top 1" is not contaminated and is not a valid basis for ruling out COCs for a different pathway (i.e., air deposition).

3. **EPA Requirement:** Collect fish & crab samples.  
**PRP Proposal:** Sample collection contingent on sediment samples exceeding sediment-fish PCLs on a statistical basis.

**Discussion:** Fish & crab sample should be collected.

- Hercules dumped barge waste water directly into the Intracoastal Waterway (from 1997 interview by TNRCC Special Investigator).
- Sediment samples collected by TNRCC in 2000 confirmed a release of contamination to the Intracoastal Waterway from the Site (PAHs, lead, zinc, pesticide).
- PRPs concerned about impacts of other contamination sources in the Intracoastal Waterway, but the Intracoastal Waterway is not contaminated except at the Site.

Multiple background sediment samples collected southwest and northeast of the site, up to 2 ½ miles away, were non-detect for organics and had low metals concentrations.

- Offsite/background fish samples should also be collected for comparison to Site area fish samples to rule out any off-site sources.
- Community is concerned about consumption of contaminated fish & crab.
- Fish sampling has been performed for other Superfund sites in EPA Region 6, including fund lead & PRP lead sites.

4. **EPA Requirement:** Perform biological tissue testing & sediment toxicity testing if sediment sample results exceed TCEQ sediment screens on a statistical basis, or if any bioaccumulative chemical is detected in the sediment.

**PRP Position:** If the TCEQ sediment screens are exceeded, then a Screening Level Ecological Risk Assessment (SLERA) will be performed to determine the need for any additional testing.

**Discussion:** Tissue and toxicity testing should be done if the TCEQ sediment screens are exceeded.

- Surface water runoff goes to wetlands north & west of Site.
- Former impoundment discharged contaminated surface water outside of ponds.
- Former impoundments leaked - multiple chemicals are present in shallow ground water below the impoundments, some at very high concentrations (> 30% of solubility). This contamination may migrate to nearby wetlands.
- Exceedance of the TCEQ sediment screens indicates there may be problems & additional data should be collected to find risks, not another study with the same data. The tissue & toxicity test results should be used to perform the SLERA.

5. **EPA Requirement:** Collect sediment samples in canals in the Bridge Harbor community.

**PRP Position:** Sediment sample collection in community canals contingent on sediment samples at perimeter of Site exceeding screens. If contamination is found on initial samples, step out 200' to collect an additional sediment sample; repeat to find extent.

**Discussion:** Canal sediment samples should be collected.

- Dust from Site operations blew into Bridge Harbor community.
- Community is concerned about health effects from Site air releases.
- Site installed fabric fence on southwest side of Site to catch this dust.
- Sediment contamination adjacent to the Site may result from surface water runoff, spills, or ground water flow to surface water, in addition to air deposition. Air deposition is the only pathway to the community.
- Extent based on one pathway, surface water runoff for example, may not be relevant to the air deposition pathway.